

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 FEELGOOD NATURAL  
HEALTH STORES, LTD.,

Defendant.

Case: 2:23-cr-20189

Assigned To : Berg, Terrence G.

Referral Judge: Altman, Kimberly G.

Assign. Date : 3/24/2023

Description: USA V. FEELGOOD

NATURAL HEALTH STORES, LTD (NA)

**VIOLATION:**

16 U.S.C. §§ 3372(a)(1) and (4) and

3373(d)(1)(B) – Wildlife Trafficking

**INFORMATION**

The United States Attorney charges,

At all times relevant to this Information:

**COUNT ONE**

(16 U.S.C. §§ 3372(a)(1) and (4) and 3373(d)(1)(B) – Wildlife Trafficking)

1. FeelGood Natural Health Stores, Ltd., was a Canadian corporation located, and operating a health food store, in Whitby, Ontario, Canada.

2. Between at least April 2019 and May 2021, Defendant offered for sale in the United States, via the internet (both its own webpage and a third-party platform), wildlife, specifically, seal oil capsules, a marine mammal product.

A. The following shipments of seal oil capsules were made, through the

Eastern District of Michigan, relevant to the charge in this case:

No.	Date	Quantity (Bottles)	Fair Market Retail Value	Shipment Type	Status
1	April 16, 2019	267	267x11.34= \$3,027.78	To fulfillment center	Seized at border and forfeited
2	April 21, 2019	156	156x11.34= \$1,769.04	To fulfillment center	Seized at border and forfeited
3	April 25, 2019	270	270x11.34= \$3,061.80	To fulfillment center	Seized at border and forfeited
4	April 29, 2019	126	126x11.34= \$1,428.84	To fulfillment center	Seized at border and forfeited
5	May 4, 2019	30	15x19.10+ 15x11.34= \$456.60	Direct from Defendant	Covert purchase
6	July 5, 2019	42	42x11.34= \$476.28	From fulfillment center	Covert purchase
7	June 29, 2020	45	45x9.79= \$440.55	Direct from Defendant	Covert purchase
	TOTAL	936	\$10,660.89		

4. Prior to the first of these shipments, Defendant's webpage for this product hosted on a third-party platform included the statement: "NOT ship to USA."

5. On April 26, 2019, the U.S. Fish and Wildlife Service sent, and on May 5, 2019, Defendant received, a Notice of Seizure and Proposed Forfeiture via the U.S. Postal Service and Canada Post stating that the shipments 1 through 3 above were seized because they were imported in violation of the Marine Mammal Protection Act and were subject to forfeiture.

6. Following covert purchases 5 and 6 above, the government agent received an email from Defendant soliciting further purchases of seal oil capsules.

7. Shipments 1 through 4 were each intended, after import, to be transported to a third-party fulfillment to be used to fill sales made through the third-party internet platform, like the sale made for shipment 6, above, to the undercover agent. Shipments 5 and 7, above, were illegally imported into the United States and then transported to the undercover agent to complete the sale.

8. From in or about April 2019, through in or about May 2021, in the Eastern District of Michigan, Southern Division, the defendant,

FeelGood Natural Health Stores, Ltd.,

did knowingly engage in conduct that involved the sale and purchase, offer of sale and purchase of, and intent to sell and purchase wildlife with a market value in excess of \$350.00, that is: seal oil capsules, and did knowingly sell and transport, and attempt to sell and transport, said wildlife, knowing that said wildlife was transported, specifically imported, in violation of and in a manner unlawful under the laws and regulations of the United States, specifically, Title 16, United States Code, Section 1372(a)(4)(B).

All in violation of Title 16, United States Code, Sections 3372(a)(1), 3372(a)(4) and 3373(d)(1)(B).

### **FORFEITURE ALLEGATION**

18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) – *Criminal Forfeiture*)

1. Count One of this Information is incorporated herein by this reference for the purpose of alleging forfeiture under Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Upon being convicted of violating Title 16, United States Code, Sections 3372(a)(1) and (4) and 3373(d)(1)(B), defendant FeelGood Natural Health Stores, Ltd., shall forfeit to the United States of America, under Title 16, United States Code, Section 3374, and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The forfeiture in this case may include entry of a forfeiture money judgment against defendant FeelGood Natural Health Stores, Ltd., in an amount up to the value of the property subject to forfeiture for the violations of conviction, that is, \$1,373.43.

3. If, by any act or omission of the defendant, the proceeds of the offense cannot be located upon the exercise of due diligence, have been transferred, sold to, or deposited with a third party, have been placed beyond the jurisdiction of the court, have been substantially diminished in value, or have been commingled with other property which cannot be divided without difficulty, the United States of America

shall seek to forfeit substitute property under Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), up to the value of the forfeitable property described above.

Respectfully submitted,

DAWN N. ISON  
United States Attorney

JOHN K. NEAL  
Assistant U.S. Attorney  
Chief, White Collar Crimes Unit

s/ Karen L. Reynolds  
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Dated: March 24 ,2023

United States District Court  
Eastern District of Michigan

## Criminal Case Cover Sheet

Case Number  
Case: 2:23-cr-20189

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: KLR

Case Title: USA v. FEELGOOD NATURAL HEALTH STORES

County where offense occurred : St. Clair County

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☒ Information --- no prior complaint.  
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### Superseding Case Information

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 24, 2023  
Date

S/ Karen L. Reynolds  
 Karen L. Reynolds  
 Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.